

Commenter	Comment	Response
Project Support		
Jeff Berino, Fire Chief, Lake Dillon Fire Protection District	The Lake Dillon Fire Protection District is in favor of this project. We feel that the proposed treatments in this critical WUI zone will enhance public safety and promote forest health and diversity	Thank you for your support.
Chuck Dennis, West Range Forest Products (WRFP)	We fully support the goals and objectives of this project and agree with the need for doing these forestry operations. We urge the Forest Service to fully utilize the various authorities and categorical exclusions available to move this project forward without additional delays or expensive analysis.	Thank you for your support.
Karn Stiegelmeier, Summit County BOCC	We would like to express our support of the project to enhance forest resiliency, reduce the extent of dwarf mistletoe infection and reduce residual mountain pine beetle impacts of fuel loading against future wildfires.	Thank you for your support.
Colorado Parks and Wildlife	CPW is supportive of the Lower Snake WUI project, as it will enhance long-term wildlife habitat by stimulating native plant regeneration and improving forest health as well as reducing fire risk within the community.	Thank you for your support.
Vegetation / Silviculture		
Rocky Smith (and signatories)	Units identified to be treated using a clearcut with leave tree prescription would have few to no leave trees.	The Forest Service defines a clearcut as a regeneration or harvest method that removes essentially all trees in a stand. A minor live component of the stand may be retained for purposes other than regeneration. The retained trees, referred to as leave trees, should generally comprise less than 10% of the growing space of the stand. Leave Trees are defined as a tree retained after even-aged harvest (same as a reserve tree). In a stand, the residual trees are

		<p>for purposes other than regeneration, such as green tree snag replacements, and comprise of a minor component of the stand, generally less than 10% of full stocking (Forest Service Manual 2400, Chapter 2470 – Silvicultural Practices, 2470.5 – Definitions.</p> <p>The NOPA describes leave trees as existing advanced regeneration, Engelmann spruce, subalpine fir, blue spruce, Douglas-fir, cottonwood and limber pine. The proposed action has been modified to include retaining healthy live and/or dead lodgepole pine for site specific reasons, such as reducing windthrow risk to residual spruce or fir trees.</p>
Rocky Smith (and signatories)	Harvesting operations may affect advance regeneration	<p>Silviculture Design Feature #3 has been included into the Decision. It states, “Where feasible retain mistletoe free lodgepole pine regeneration less than 5.0” DBH with live crown ratios greater than 60%.</p> <p>The Forest Service agrees that harvesting operations may damage existing regeneration. Clauses in the Timber Sale Contract and Stewardship Contracts will be included to protect residual trees from unnecessary damage. Additionally, all skid trail locations would be approved by the Forest Service prior to operations. Furthermore, due to treatment, it is anticipated that within 5 years a minimum of 150 lodgepole pine trees (and/or 300 aspen trees) per acre will be established through natural regeneration.</p>
Rocky Smith (and signatories), Howard Brown	Commenter questions how the Proposed Action meets the Purpose and Need in terms of age class and species diversity.	<p>The proposed even-aged treatments; clearcut with leave tree, coppice clearcut and patch clearcut, would create new age classes in areas dominated by single-story lodgepole pine. These newly regenerated forest stands would break-up the existing continuous canopy and provide for age and structure diversity across the project area.</p> <p>Coppice clearcut treatments were designed to expand the presence of aspen within the project area. Stands proposed to be treated with this prescription were chosen based on existing species composition, and the expectation that these stands will</p>

		eventually transition from being dominated by conifers to being dominated by aspen.
Rocky Smith (and signatories)	Disclose the likelihood of regeneration following treatment.	The likelihood of natural regeneration is discussed in the Vegetation Report. Site specific silvicultural prescriptions are also developed to ensure natural regeneration occurs. The National Forest Management Act and Forest Plan Standards require even-aged regeneration treatments occurring on suitable lands meet minimum stocking standards within 5 years of the final harvest. Stocking surveys would be conducted in these units in the 1 st , 3 rd , and 5 th years following harvest to ensure natural regeneration is occurring. In the event these areas are not regenerating to standard, they would be planted with appropriate stock.
Howard Brown	Commenter would prefer a no action alternative, allowing natural succession.	Thank you for your comment.
Howard Brown	Questions the level of mortality in the project area.	Mortality calculations included all lodgepole pine trees greater than 5.0” dbh. Forty-five plots were observed in the Tenderfoot area, and of those trees measured, on average 50% of the basal area was dead.
Colorado Parks and Wildlife	Monitor post-treatment and re-seed disturbed areas with native shrubs, grasses, and forbs to enhance growth in areas that do not regenerate reasonably on their own.	Engineering Design Feature #2 and Aquatics & Soils Design Features #17 and #18 have been included that require skid trails, landings and temporary roads be seeded with a Forest Service approved weed free seed mix.
Fuels		
Rocky Smith (and signatories), Howard Brown	Activity slash may change wildfire behavior and spread.	The Fire and Fuels Report discusses the effects of the proposed action on wildfire behavior and spread. Overall there will be less fuels left in treated areas.
Rocky Smith (and signatories)	The Forest Plan requires retaining 100 linear feet of down logs at least 8 inches in diameter per acre.	Forest Plan Standards for Coarse Woody Debris would be met. Methods in which standards may be met include (but are not limited to): Mark standing dead trees as leave trees and fell them following harvest activities, retain existing down material, or through the retention of activity slash.

Rocky Smith (and signatories)	Swan Mountain and Keystone Gulch are not in focus areas identified by the CWPP. Other areas in Summit County are identified in the CWPP as having a higher priority for treatment.	All proposed treatment areas are within the Wildland Urban Interface identified in the CWPP. The CWPP is a guide used by local, county and federal land managers, but does not direct the Forest Service program of work. Keystone Gulch and Swan Mountain were identified as treatment areas by members of the community during the collaboration process. Local fire protection districts and Summit County are supportive of this project.
Summit County BOCC	Remove as much standing timber and slash as possible to effectively reduce the amount of flammable vegetation left on the forest floor.	The treatment prescriptions for each stand have been designed to meet the project's Purpose of breaking up the continuity of fuels and reducing the accumulation of future heavy fuel loading within the Wildland Urban Interface, while minimizing potential impacts to other resources. Fuels Design Features #1 and #2 describe the limits of residual fuel loading that will meet the project's Purpose and Need, while providing protection for other resources.
Wildlife / Fisheries		
Rocky Smith (and signatories)	Proposed action would affect wildlife and their habitats. Effects, including cumulative effects need to be addressed in the environmental analysis.	Direct, indirect and cumulative effects of the proposed action to wildlife and their habitats are discussed in the Biological Assessment and Biological Evaluation prepared for the project. CPW is supportive of the project as it will enhance long-term wildlife habitat.
Colorado Parks and Wildlife	CPW requests that USFS train employees to identify boreal toads and that local CPW staff be notified if any adult toads are found during project activities to prevent any mortality of this protected species.	Although there are no documented breeding sites of boreal toads within the project area, a design feature has been added to the Decision Memo that states: "To ensure boreal toads are protected during project implementation, the Forest Service will train sale preparation and sale administration crews on boreal toad identification"
Colorado Parks and Wildlife	CPW recommends that project activities avoid any downstream disturbance from the Montezuma Road and Keystone Gulch units, as discharge or sedimentation may negatively affect boreal toads inhabiting in the area.	The effects of the proposed action on boreal toads and their habitat are discussed in the Aquatic Species Biological Assessment and Biological Evaluation. Additionally, the Engineering, Aquatics, and Soils' Design Features within the Decision Memo have been designed to minimize disturbance resulting from the Proposed Action.

Recreation		
Howard Brown	Vegetation management activities could affect the recreational experience on roads and trails within the project area.	The proposed action could affect the recreational experience on existing trails within the project area. Closures or delays are expected to be a temporary effect. The Forest Service recognizes and discloses in the recreation report that treatments may cause individuals using specific trails to seek their experiences elsewhere on the district. The effects of the proposed action on visuals is discussed in the Scenery Resources report. Recreation and Scenery specific Design Features have been added to the Decision Memo to minimize impacts to these resources.
Hydrology / Soils		
Forest Health Task Force (FHTF)	“Watersheds in this area have been identified as high hazard for flooding/debris flow and sediment yield following wildfires. Identifying these watersheds, and treatments within them, would provide documentation of watershed benefits that would protect not just water supply but also, aquatic ecology, fisheries, riparian areas, as well as human safety at road crossings that are high hazard for debris flows and high sediment yields.	Thank you for your comment. Benefits of the project have been added to the purpose and need.
Rocky Smith (and signatories), Howard Brown	Clearcutting on steep slopes can promote erosion.	The effects of the proposed action on soils is discussed in the Soils report. Also, specific Design Features aimed at soil resource protection have been added to the Decision Memo. For instance, Soil Design Feature #9 states, “Avoid ground skidding logs on ‘sustained’ slopes steeper than 40% grade, as well as on moderated to severely unstable slopes greater than 30%.
Rocky Smith (and signatories)	Analyze and disclose impacts on water quality.	The effects of the proposed action on water quality is discussed in the Watershed report
Howard Brown	Cites a Forest Service study conducted at the Fraser National Forest that suggested water yield was greater when forests with some dead trees were retained vs. regenerating lodgepole pine	Thank you for your comment. The comment is outside the scope of the project. The purpose and need does not include an increase in water yield.
Noxious Weeds / Botany		

Rocky Smith (and signatories), Summit County BOCC, Colorado Parks and Wildlife	Project related ground disturbance may create conditions suitable to the establishment of noxious weeds. Commenters suggest pre and post implementation surveys to identify and treat noxious weed populations.	The project may create conditions conducive to the establishment of noxious weeds. Design features and contractual clauses obligate the cleaning of equipment to minimize the spread of noxious weeds. Surveys have been conducted in the area and populations of noxious weeds are known to occur. Follow-up treatments are planned. During regeneration stocking surveys, crews will identify noxious weed populations and report them to the invasive crew for treatment.
Rocky Smith (and signatories)	Identify and protect rare plant populations during project implementation	Design Feature Sensitive Plants #1 discusses protection measures for any rare, sensitive or endangered plants that are identified within the project area.
Scenery		
Rocky Smith (and signatories), Summit County BOCC	The Proposed Action may affect scenic integrity levels	The effects of the proposed action on scenery are addressed in the Scenery Resources report. Also, specific Design Features aimed at scenic resource protection have been added to the Decision Memo.
Project Coordination / Contracting		
FHTF	Would like to review protection measures for the temporary road crossings of the Oro Grande Trail.	Trails and other existing infrastructure will be listed as an improvement to be protected under any contract issued by the Forest Service. Contractually, if damage occurs to a protected improvement the contractor is obligated to restore them to their pre-existing condition. Additionally, the recreation Design Features #1, 2, and 7 have been added to the Decision Memo to minimize impacts to the Oro Grande Trail.
FHTF	Remove salvage timber as an economic incentive and pay loggers (treatment specialists) higher prices per acre to treat.	Outside the scope of the project. The purpose of National Environmental Policy Act is to document the effects of the project to the environment. Implementation of the proposed action can occur through different mechanisms including timber sale contracts or stewardship contracts, which occur after the NEPA process is complete.

Rocky Smith (and signatories)	Helicopter logging is noisy and may impact recreation and wildlife.	The effects of helicopter logging (closures) on recreation is discussed in the Recreation report. Helicopter noise is subjective to each individual and their particular tolerance to noise. The effects of helicopter noise is disclosed in the project record. Impacts of helicopter logging on wildlife species is discussed in the Biological Assessment and the Biological Evaluation prepared for the project. Operational specific Design Features have been included in the Decision Memo to reduced impacts to recreationalists and wildlife.
WRFP	Consider using mechanical methods of treatment in areas designated as hand treatments.	The Forest Service is limited by slope, soils and access on where mechanical treatments can occur. The project area has been evaluated and appropriate implementation methods were assigned to individual treatment units.
WRFP	Sufficiently design roads and landings so chip vans and grinding equipment can utilize them.	The project has been evaluated for the use of log trucks, chip vans and grinding equipment.
WRFP	Coordinate project implementation including project timelines, helicopter logging and hand treatments with potential contractors.	Thank you for your comment. The comment is outside the scope of the project. The purpose of NEPA is to document the effects of the proposed action to the environment. The Forest service can coordinate during the implementation phase of the project.
Howard Brown	“Because Keystone Resort is a primary perceived stakeholder and ‘beneficiary’ of the likely most expensive (‘helicopter yarding’) portions of the plan, they should be made to pay for any operations in Keystone Gulch rather than taxpayers.”	Thank you for your comment. The comment is outside the scope of the project. The purpose of NEPA is to document the effects of the proposed action to the environment. Implementation and funding are separate from the NEPA process.
Summit County BOCC	Concerned about the deterioration of asphalt on roadways due to the volume of heavy loads every day during multiple operating seasons. Request the project include a description on provision the USFS is including to address potential road base impact.	Roadways used in the implementation of the project are public. All contractors will be required to adhere to federal, state and local laws concerning the use of public roads.
Summit County BOCC	Would like the project to clearly state where logs are to be dropped and stored in Keystone Gulch, until hauled away, due to public safety related concerns.	Landings may be located anywhere along Keystone Gulch road that is not explicitly restricted in design features. Recreation Design Feature #4 within the Decision Memo outlines protocol for public safety during helicopter operations.

Summit County BOCC	“Units 301 and 302 need to be clearly identified with ground signage and the associated closure areas need to be documented in the plan so the recreational public is informed and aware of the size of the closures and the closure duration.”	A signage program, public outreach and possibly on the ground personnel would be used to enforce the closure along Keystone Gulch road during helicopter operations. Please see Recreation Design Feature #4 within the Decision Memo.
Summit County BOCC	“Request funds be put toward the riskiest conditions first and that every phase of each unit be completed prior to moving on to additional units. We ask the Forest Service not to leave slash piles for future disposal in the event funding runs out. We would prefer not to have wildfire fuel sources such as slash piles left after project completion.”	The Forest Service must consider the feasibility of treatments economically and operationally (i.e. slope, equipment accessibility, etc.). Therefore, the proposed action of the project includes creating hand piles for later burning by the Forest Service. This is expected to occur along Swan Mountain Road, Keystone Gulch, Montezuma Road and Frey Gulch. The Forest Service will burn piles created in hand treated units as soon as environmental conditions allow (smoke permit limits, snowpack levels, etc.).
Summit County BOCC	Utilize Youth Corps Members wherever feasible to reduce implementation costs.	Thank you for your suggestion. Rocky Mountain Youth Corps is scheduled to work on this project.
Colorado Parks and Wildlife	Recommends that all temporary roads should be properly signed to deter public use during treatment and reclaimed and rehabilitated immediately after completion of treatments	Design features have been included in the Decision Memo to address the concern of motorized and mechanized use on temporary roads during harvest operations and following harvest operations. Temporary roads would be closed and/or obliterated to motorized and mechanized use following harvest activities. Recreation design feature #1, Engineering Design Feature #2, and Aquatics & Soil Design features #16 and #17.
Process/NEPA		
FHTF	Project metrics should value all acres treated equally, whether the treatment is clear-cut, thinning, mistletoe trimming, or slash/down tree removal.	Impacts of proposed action are discussed in specialist reports. How projects are upwardly reported for completion by the Forest Service is outside the scope of NEPA.
Howard Brown, Rocky Smith (and signatories)	Project effects should be documented in an environmental assessment rather than a categorical exclusion.	The proposed action falls within a CE category established by statute. Specialists prepared reports to document the effects of the project and to ensure no extraordinary circumstances exist. Specialist Resource Reports are included in the project record.
Rocky Smith (and	The largest trees of all species should be retained, as required by the law the NOPA [Notice of Proposed	The statue reads “largest tree species should be obtained as appropriate for that species.” Many of the largest lodgepole pine

signatories), Howard Brown	Action] states will be used to authorize a CE [categorical exclusion] for the project.	trees have succumbed to the mountain pine beetle epidemic. In addition trees of other species are likely to be the largest within the project area and are identified as leave trees.
Rocky Smith (and signatories)	Disclose the impacts of helicopter use in the environmental analysis.	The impacts of helicopter use are addressed in affected resources' specialist reports located in the project record.
Rocky Smith (and signatories)	Design features should be presented to the public for comment as part of an environmental assessment on which comment is allowed.	Design Features are often created as resource specialists analyze the impacts of the project and comments are received from the public. The project was publically scoped as required by the National Environmental Policy Act.
Rocky Smith (and signatories)	Cumulative effects to resources must be considered and the effects disclosed as required by 40 CFR 1508.7	Cumulative effects are addressed in reports prepared by specialists.
Howard Brown	“List of organizations ‘collaborated with’ in developing the plan includes two Forest Service affiliated organizations, Keystone Resort, Denver Water and the county landfill. No recreational, environmental, property-owner or other general public interests likely to be harmed by the plan are mentioned. This is clearly inadequate.”	This project was developed in a collaborative manner, the Decision Memo outlines the collaboration that occurred while developing this project. Meetings were inclusive and open to the public. Collaboration comments were sought at multiple times from interested members of the public. HOA groups were invited to public meetings which were also advertised in the Summit Daily. Site specific collaboration with Ski Area managers and the county landfill was done as certain aspects of the proposed action affected those entities. Additionally, much input and communication was received through local citizens involved with the Summit County Forest Health Task Force.
Summit County BOCC	“Initiate a significant public outreach campaign prior to beginning work on the ground to ensure public understanding of the Lower Snake WUI project.	The Forest Service would create press releases describing the project, where implementation is going to occur, and why it is occurring prior to project implementation.
Suggested Alternatives / Modifications		
Summit County Forest Health Task Force (FHTF), Summit	Add the following to the Purpose and Need: “Increasing forest resilience, through increased age, structural, and species diversity, will also reduce impacts on recreation resources, and help protect other community values such as economics, waters supply and public safety.”	The impacts of forest resilience on recreation resources, economics, water supply and public safety were added as a benefit of the proposed action, but is not a driving force of the project.

County BOCC		
FHTF	Believes that watershed protection and water supply protection included in the Purpose and Need	Added as a benefit of the proposed action but is not a driving force of the project.
Howard Brown, Rocky Smith (and signatories)	Consider an alternative that limits the scope of the project to areas where fuel reduction and hazard tree removal would be most needed: “instances of critical importance to protection of ‘urban’ development”; “boundaries with private property, along roads and powerlines, and near trailheads and campgrounds.”	This alternative would not meet the purpose and need of the project. The project occurs within the WUI boundary and was designed with current infrastructure in mind including powerlines, trails, roads, ski areas, water supplies, and forest health.
FHTF, Rocky Smith (and signatories)	Recommend tree retention to “promote visual, age, structural, habitat, landscape, and recreational diversity; and give the USFS greater flexibility in administering timber sale contracts” and to reduce blowdown potential for non-lodgepole pine trees	Trees other than lodgepole pine would not be cut unless required by specific circumstance such as temporary road construction, landing construction or increased windthrow risk. In addition during layout crews under the guidance of a certified Silviculturist have the discretion to mark healthy live or dead lodgepole pine to meet a variety of circumstances; including reducing windthrow risk for other identified leave trees, green tree retention for future snags, snags for wildlife or snags that will be later felled to meet coarse woody debris requirements.
FHTF, Summit County BOCC	Include a provision to include trimming of dwarf mistletoe infected branches	Thank you for your comment. In pre-commercial thinning units, the trimming of dwarf mistletoe infected branches has been added. However, in units with mature trees, it would not be economically feasible or affective in reducing the spread of mistletoe.
FHTF	Include a provision to treat young dense stands by hand thinning and removal; early in the project	This is part of the proposed action in areas where harvesting occurred 25-30 years ago. Any environmental analysis completed to treat newly created young dense stands would not be valid as treatments would not be anticipated to occur for 15+ years.
FHTF	Include down tree removal as a treatment option where appropriate	This may be included during project implementation, depending on the amount of down trees within treatment units. After Forest Plan Standards for coarse woody debris are met, Fuels Design Feature #1 would direct whether the added expense of removing downed trees would be economically justified.

Rocky Smith (and signatories)	Recommends that slash be treated with a combination of methods: lop and scatter, hand pile, hand pile and burn, and chipping (to a depth of no more than two inches over no more than 20 percent of each treatment unit). Some larger pieces should be retained to protect soils and for other resources and provide wildlife habitat, but fuels of any size must not be continuous.	Slash is being treated the following ways: lop and scatter / pile and burn in pre-commercial thinning units. In mechanically treated units residual fuel loading would be below 15 tons per acre and would likely be whole tree yarded. Hand treatment units would be piled and burned with a residual fuel loading below 24 tons per acre. Forest Plan Standards for coarse woody debris would be met in all treatment units.
Rocky Smith (and signatories), Howard Brown	Remove dwarf mistletoe management as a purpose of the project.	Although the proposed action and purpose and need for the project is unlikely to eradicate dwarf mistletoe from the landscape, there is an opportunity to reduce the likelihood of new regeneration becoming infected by dwarf mistletoe by removing the infected overstory. If no action were to occur, new regeneration developing under the partially dead canopy would become infected with dwarf mistletoe, affecting overall tree health and decreasing forest resilience to disturbance such as drought and forest pests.
WFRP	Would like to see larger treatment units	Through public and partner collaboration, treatment units were identified for this project. Once identified, unit boundaries/location/size were determined by terrain, soils, and Forest Plan Standards on what treatments can be done and where.
Howard Brown	Add a ¼ mile no treatment buffer on trails within the project area.	This is not required by the Forest Plan. Furthermore, it would not meet the Purpose and Need of the project.
Howard Brown	Extend the Keystone Gulch Trail further upstream	This is outside the scope of the project. The Keystone Gulch Trail has been closed as part of the White River National Forest Travel Management Plan.
Summit County BOCC	Allow winter operations to minimize ground disturbance.	Winter operations are not likely to occur as many of the treatment units occur in deer and elk winter range and have seasonal closures to protect these species under the Forest Plan. See Wildlife Design Features #6, 7, 8, and 11.
Summit County BOCC	Remove material during off hours and avoid weekends	Design features have been included in the project that restrict operations at night due to noise and wildlife concerns. However, log hauling, log loading and road maintenance during weekends will be prohibited in specified units to minimize conflicts with recreationalists. Additionally, on the Friday and Saturday of

		each Colorado Parks and Wildlife opening rifle seasons, operations will be prohibited.
Colorado Parks and Wildlife	Recommends that vegetation treatments in the Frey Gulch and Keystone Gulch units occur after July 1 st to avoid disturbance and displacement of calving elk and fawning deer.”	The following design feature has been included in the Decision Memo “ To minimize disturbance to big game in important elk calving and deer fawning habitats, no timber purchaser operations, timber harvest/treatment activities, fuel reduction mechanical treatments, road construction/maintenance/obliteration work (including temporary roads), post-sale activities, nor any additional activities that involve the use of heavy equipment and/or chainsaws should be allowed during the period of May 15 – June 30 in the following proposed treatment units: Frey Gulch 107-110, 201, and 401-403; Keystone Gulch 112, 113, 208, 301, and 302. This includes hauling on roads through elk production areas.”
Colorado Parks and Wildlife	Recommends that all vegetation management activities in the Tenderfoot Mountain, Frey Gulch and Swan Mountain Road units occur outside of the time period between December 1 st to May 1 st to minimize disturbance and avoid stressing wintering elk and mule deer.	The following design feature has been included in the Decision Memo “In order to minimize disturbance to wintering big game, no operations should be allowed during the period of December 1 – April 14 in the Tenderfoot Mountain and Frey Gulch units (units 101-110, 201, and 401-403). This includes hauling on roads through big game winter range.”
Colorado Parks and Wildlife	Recommends that all workers avoid leaving unsecured food or coolers outside, and utilize bear proof trash containers while on-site and/or remove all garbage daily to prevent conflicts with black bears and other nuisance wildlife.	The Forest Service would approve any contractor camps and include a food storage requirement as part of the Timber Sale or Stewardship contract.
Colorado Parks and Wildlife	Recommends that no dogs be allowed on vegetation treatment sites unless they remain on a leash at all times in order to avoid dogs running at large and harassing moose, deer , elk or other wildlife	Contractors would be required to follow Forest Service regulations and State wildlife laws while on site.
Colorado Parks and Wildlife	Recommends that vegetation treatments in Keystone Gulch occur after July 1 st to avoid disturbance and displacement of calving moose (in addition to calving elk).	The following design feature has been included in the Decision Memo “ To minimize disturbance to big game in important elk calving and deer fawning habitats, no timber purchaser operations, timber harvest/treatment activities, fuel reduction

		<p>mechanical treatments, road construction/maintenance/obliteration work (including temporary roads), post-sale activities, nor any additional activities that involve the use of heavy equipment and/or chainsaws should be allowed during the period of May 15 – June 30 in the following proposed treatment units: Frey Gulch 107-110, 201, and 401-403; Keystone Gulch 112, 113, 208, 301, and 302. This includes hauling on roads through elk production areas.”</p>
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